

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-CR-108 (2) (PAM/TNL)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	MOTION FOR DISCLOSURE OF 404(B)
)	EVIDENCE
)	
TOU THAO,)	
)	
Defendant.)	
)	

The Defendant, Mr. Tou Thao, by and through his attorneys, Robert Paule and Natalie R. Paule, respectfully moves the Court for an order directing the Government to disclose any "bad act" or "similar course of conduct" evidence it intends to offer at trial pursuant to Rule 404(b), Fed.R.Evid., on the following grounds:

1. Pretrial disclosure would prevent any judicial surprise at trial;
2. Pretrial disclosure would allow defendant's counsel to adequately prepare to meet the issues to be presented at trial;
3. Pretrial disclosure would allow the defendant the opportunity to timely seek exclusion of such prejudicial and non-relevant evidence; and

4. The government should not be permitted to conceal, until trial, particular crimes or acts it intends to offer in evidence in its case in chief, hence this motion.

This Motion is based upon the files, records and proceedings herein, such testimony as may be presented at the motion hearing, and any briefing which the Court may require thereafter.

Respectfully submitted,

Dated: This 3rd day of August, 2021

/s/ Robert M. Paule
Robert M. Paule (#203877)
Robert M. Paule, P.A.
920 Second Avenue South
Suite 975
Minneapolis, MN 55402
T: (612) 332-1733
F: (612) 332-9951

Natalie R. Paule (#0401590)
Paule Law P.L.L.C.
101 East Fifth Street
Suite 1500
St. Paul, MN 55101
T: (612) 440-3404
nrp@paulelaw.com

Attorneys for Tou Thao